

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

RUDI LOVATI AND ALESSANDRO  
LUCIBELLO PIANI,

Plaintiffs,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

C.A. No. 1:23-MC-340

CRYSTALLEX INTERNATIONAL CORP.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF VENEZUELA,

Defendant.

Misc. No. 17-151-LPS

**NOTICE OF WITHDRAWAL AS ADDITIONAL JUDGMENT CREDITOR**

1. On July 27, 2023, the Court entered a memorandum order (D.I. 646)<sup>1</sup> in which, *inter alia* the Court outlined seven steps that creditors must complete to participate in the sale as an Additional Judgment Creditor (the “Steps”).

2. On October 11, 2023, the court directed any party seeking to become an Additional Judgment Creditor to notify the Court of all completed Steps with supporting documentation (D.I. 738, ¶ 3).

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<sup>1</sup> References to “D.I. \_\_\_\_” are to the *Crystallex International Corp. v. Bolivarian Republic of Venezuela* action, C.A. No. 17-151-LPS.

3. On October 16, 2023, Plaintiffs Rudi Lovati (“Lovati”) and Alessandro Lucibello Piani (“Piani”) notified the Court of the completion of Steps 1–4 (D.I. 747).

4. On November 2, 2023, Plaintiffs notified the Court of the completion of Step 5 (D.I. 775).

5. On April 9, 2024, Plaintiffs notified the Court of the completion of Steps 6 and 7 (D.I. 1117).

6. On February 3, 2025, Plaintiffs notified counsel for the Special Master that Plaintiffs intended to withdraw from the impending sale and sought confirmation that, as a result, Plaintiffs will not be entitled to share in proceeds of the sale, but would still receive their share of the reimbursement of the Special Master’s legal fees paid to date.

7. On the same day, the Special Master’s counsel confirmed the same.

8. As a result, Plaintiffs hereby notify the Court that it is withdrawing as an Additional Judgment Creditor for purposes of participating in the impending sale. Pursuant to Plaintiffs’ communications with counsel for the Special Master, Plaintiffs will no longer share in the proceeds of the sale, but will be reimbursed for their share of the legal fees paid to date out of the proceeds of such sale.

*[Remainder of page intentionally left blank]*

Dated: February 26, 2025

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